

**STATE OF SOUTH CAROLINA**  
**BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION**  
**DOCKET NO. 2004-4-G**

IN THE MATTER OF:	)	
	)	
Annual Review of the Gas Costs and Gas	)	PETITION TO
Purchasing Policies of Piedmont Natural	)	INTERVENE
Gas Company	)	
_____	)	

Elliott F. Elam, Jr., Acting Consumer Advocate for the State of South Carolina (Consumer Advocate), respectfully petitions the South Carolina Public Service Commission (Commission) for the permission to intervene in the above captioned docket and states:

1. On April 6, 1988, the Commission issued its Order No. 88-294 which requires annual review of the purchased gas adjustment and gas purchasing policies of Piedmont Natural Gas Company.
2. The Commission assigned Docket No. 2004-4-G to this matter and set a hearing for July 22, 2004.
3. Elliott F. Elam, Jr. is the duly appointed and qualified Acting Consumer Advocate for the State of South Carolina. Pursuant to S.C. Code Ann. § 37-6-604 (1976), the Consumer Advocate has the discretionary duty to provide legal representation of the consumer interest before state regulatory agencies when such agencies undertake to fix rates or prices for consumer products or services or to enact regulations or establish policies related thereto. In that capacity, the

Consumer Advocate petitions to intervene as a formal party of record in the proceedings before the Commission in the above referenced matter.

4. The Consumer Advocate's position in this proceeding is to ensure that (a) the Company's gas purchasing practices are reasonable, (b) the incurred gas costs during the past year were prudent and appropriate, and (c) the resulting factor is reasonable.

**WHEREFORE**, the Consumer Advocate, in order to represent the consumer interest of the State of South Carolina, requests:

(a) that this Commission grant the Consumer Advocate permission to intervene as a formal party of record in this proceeding , and on behalf of the consumers of the State of South Carolina;

(b) that he be provided a copy of all testimony and exhibits filed by all parties of record in Docket No. 2004-4-G; and

(c) that he be provided a copy of any and all studies, reports, and data requests made by the Commission Staff in Docket No. 2004-4-G.

Respectfully submitted:

Elliott F. Elam, Jr.  
Acting Consumer Advocate

Hana Pokorna-Williamson  
Staff Attorney

BY: \_\_\_\_\_  
SC Dept. of Consumer Affairs  
Post Office Box 5757  
Columbia, SC 29250-5757  
(803) 734-4188

March 18, 2004  
Columbia, South Carolina

## **CERTIFICATE OF MAILING**

This is to certify that I, Hana Pokorna-Williamson, on behalf of Philip S. Porter, Consumer Advocate for the State of South Carolina, have served a copy of the foregoing Petition to Intervene on the person(s) named below, at the addresses set forth, by first class mail, this 18<sup>th</sup> day of March 2003:

Tom Skains  
President and Chief Operating Officer  
Piedmont Natural Gas Company  
Post Office Box 33068  
Charlotte, NC 28233

James H. Jeffries, IV, Esquire  
Nelson, Mullins, Riley & Scarborough  
100 North Tryon Street  
Suite 3350  
Charlotte, NC 28202-4000

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Columbia, South Carolina